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Hon. Colleen McMahon
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *Champion et al. v. Moda Operandi, Inc. et al.*, 1:20-cv-07255-CM

Your Honor,

We represent the plaintiffs in the above-referenced action. Counsel for defendants Advance Magazine Publishers, Inc. d/b/a Conde Nast and Advance Publications, Inc. d/b/a Conde Nast (collectively the "Conde Nast Defendants") have approved of and are copied on this letter.

We are writing to inform the Court that all plaintiffs with claims against the Conde Nast Defendants (specifically Ugbad Abdi, Eniola Abioro, Ambar Cristal Zarzuela Montero, Alanna Arrington, Dylan Christensen, Luisana Gonzalez, Grace Elizabeth Harry Cabe, Grace Hartzel, Joao Knorr, Damien Medina, Lineisy Montero, Blanca Padilla, Cara Taylor, Vera Van Erp, Leona Walton and Anok Yai) have reached an agreement in principle with said Conde Nast defendants. For the avoidance of doubt, said agreement does not affect any claims against Moda Operandi, Inc. Counsel are currently preparing a written agreement and aim to finalize and file a Stipulation of Discontinuance in an efficient manner. Accordingly, we respectfully request that the Court issue a 30-day Order of Dismissal with prejudice with respect to both the above-listed plaintiffs' claims against the Conde Nast Defendants, and the Conde Nast Defendants' counterclaim against said plaintiffs. Additionally, there is a pending motion for judgment on the pleadings (Docket No. 60), which is now moot.

While we do not foresee any problems with the agreement being finalized, we will contact the Court should any arise. The Court's courtesies are appreciated.

Respectfully,

s/ Edward C. Greenberg (EG 5553)

Cc. Via Email:

Ms. Elizabeth McNamara
Mr. Adam Rich

*admitted in New York
†admitted in New Jersey

Clerk of Court
to close this motion
as moot

4/11/2022
re dismiss
against
Conde Nast
only